

## **PSJ9 Exh 14**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION  
4   IN RE NATIONAL PRESCRIPTION                   MDL No. 2804  
5   OPIATE LITIGATION                               Case No. 17-MD-2804  
6   This Document Relates to:                   Judge Dan Aaron Polster  
7   The County of Summit, Ohio,  
8   et al., v.  
9   Purdue Pharma L.P., et al.  
10   Case No. 17-op-45004  
11   The County of Cuyahoga v.  
12   Purdue Pharma L.P., et al.  
13   Case No. 18-op-45090  
14   City of Cleveland, Ohio v.  
15   Purdue Pharma L.P., et al.  
16   Case No. 18-op-45132

17                   Thursday, January 10, 2019

18                   - - -

19                   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
20                   CONFIDENTIALITY REVIEW  
21                   - - -

22                   Videotaped deposition of SABRINA SOLIS, held  
23                   at Foley & Lardner LLP, One Biscayne Tower,  
24                   2 Biscayne Boulevard, Suite 1900, Miami, Florida,  
25                   commencing at 10:27 a.m., on the above date,  
                 before Susan D. Wasilewski, Registered  
                 Professional Reporter, Certified Realtime  
                 Reporter, Certified Realtime Captioner.

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1 Q. So at that time it says: 9,624 customers  
2 that no questionnaire yet were flagged as yes for  
3 being able to purchase controls; is that right?

4 A. Yes.

5 Q. So it's your testimony today that that's the  
6 standard that the Anda leadership wanted to keep  
7 once they brought you into compliance?

8 A. Yes.

9 Q. They wanted to keep that large number of  
10 customers as being flagged for yes yet not having  
11 customer questionnaires on file?

12 A. No, that's not what I was saying. I'm  
13 saying the department wanted to collect updated  
14 questionnaires on the customer base.

15 Q. Because at that time there were nearly  
16 10,000 customers that were allowed to buy controls  
17 within TPS, yet there was no customer questionnaire  
18 on file for them?

19 A. They were eligible to buy controls, but as  
20 we talked about, previous to this e-mail, a lot of  
21 them were not even actively buying from Anda.

22 Q. But if a -- if they attempted to purchase a  
23 control from Anda and a compliance analyst went into  
24 the TPS program and looked at whether they were  
25 eligible for it, they would see the flag as yes,

1 correct?

2 A. Yes.

3 Q. And that would, as we discussed before,  
4 potentially shorten the time that they would take to  
5 review an order for controls to be approved or not?

6 MS. KOSKI: Object to form.

7 A. No. We don't ever look at the control flag  
8 and make a determination that it's going to take a  
9 shorter amount of time because they are flagged Y.  
10 And that's why we delve into the other procedures  
11 where our review process kicks in and we look at  
12 what is the item the customer is ordering, who is  
13 the customer, and what is the quantity they are  
14 ordering.

15 Q. That 9,624 number did not even include  
16 chains, did it?

17 A. No.

18 Q. So there were, in fact, more than 9,624  
19 customers in October of -- I guess that was in 2011  
20 that were eligible for controls but there was none  
21 of the -- no questionnaire on file for them?

22 MS. KOSKI: Object to form.

23 Go ahead.

24 BY MS. ELLIS:

25 Q. Go ahead.